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March 21, 2016

FILED & SERVED ELECTRONICALLY

Honorable Alvin K. Hellerstein
United States District Judge
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: American Civil Liberties Union, et al. v. Department of Defense, et al.
Docket No. 15-cv-9317

Dear Judge Hellerstein:

This Firm is co-counsel for Plaintiffs in the above-captioned matter. Please accept this letter, jointly submitted by the parties, to request an adjournment of the initial conference, currently scheduled for March 25, 2016; no previous adjournment has been requested or granted. Since the Court scheduled the initial conference on February 4, 2016, the parties have negotiated a schedule for the Government to complete processing of Plaintiffs' Freedom of Information Act request. Subject, of course, to the Court's approval, the schedule would be as follows:

- The Government will process and produce any non-exempt documents by May 30, 2016.
- The parties will meet and confer regarding any withholdings by June 30, 2016.
- The parties will jointly submit a proposed briefing schedule with regard to any withheld documents to the Court by June 30, 2016.

As noted, both parties agree to the above schedule, which may eliminate the need for a conference altogether. We hope it is satisfactory to Your Honor as well. If so, please So Order it below, and enter it on the docket.

Of course, if the Court has any questions or concerns, please do not hesitate to contact me. Thank you for your kind consideration and attention to this matter.

GIBBONS P.C.

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Respectfully submitted,

Lawrence S. Lustberg
Director

cc: Tara LaMorte, Assistant U.S. Attorney (via email)
Sarah Normand, Assistant U.S. Attorney (via email)
Dror Ladin, Esq. (via email)
Beth Haroules, Esq. (via email)

So ordered,

Hon. Alvin K. Hellerstein
United States District Court Judge
Southern District of New York